

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

KATIE FONDREN CARSON, as Administratrix  
of the Estate of Brian Christopher Ray, AND  
on Behalf of the Wrongful Death Beneficiaries of Brian Christopher Ray,  
AND as Mother and Next Friend of B.Z.R., a Minor PLAINTIFFS

VERSUS

NO. 3:23CV3063-HTW-LGI

RANKIN COUNTY, MISSISSIPPI, AND  
BRYAN BAILEY, AMANDA THOMPSON,  
JOSHUA BRIDGES, MASON BLACK,  
JOHNATHAN FRANKLIN, TOMMY  
HILDESHEIM, AND PATRICK THORNTON,  
In Their Individual Capacities DEFENDANTS

MOTION FOR EXTENSION OF TIME TO SERVE PROCESS

COME NOW the Plaintiffs, by and through counsel of record, and file their  
Motion for Extension of Time to Serve Process pursuant to Fed. R. Civ P. 4(m) and Fed.  
R. Civ. P. 6(b)(1)(A). For cause, the Plaintiffs show the Court as follows:

1. This civil action was filed and summons was issued on November 7, 2024.

The 90-day period for effecting service of process expires on February 5, 2024.

2. After the Complaint was filed, counsel for the Plaintiffs conferred with  
counsel for the Defendants who advised the Defendants were likely amenable to  
waiving service of process.

3. On January 11, 2024, in accordance with their conversation, Plaintiffs' counsel  
forwarded requests to waive service of process to counsel for the Defendants.

4. Counsel for the Plaintiffs conferred via e-mail with counsel for the Defendants this afternoon. Counsel for the Defendants advised that he expected to file waivers of service for the Defendants the week of February 5th, or soon thereafter.

5. Because the deadline for service of process is February 5, 2024, the Plaintiffs request a thirty-day extension of the deadline for service of process, or until March 6, 2024, to file the waivers of service or otherwise effectuate lawful service of process.

6. The Defendants will not be prejudiced by the Court granting this requested extension of time to serve process.

7. Counsel for the Plaintiffs has conferred with counsel for the Defendants, Jason E. Dare, Esq., who advised that there is no objection to this motion or the relief requested.

8. Because this motion is self-explanatory, the Plaintiffs request to be relieved from the obligation of filing a supporting memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs request that the Court enter an order allowing an additional 30 days, or until March 6, 2024, in which to complete service of process on the Defendants.

Respectfully submitted, this the 2nd day of February, 2024.

/s/ Victor Israel Fleitas

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VICTOR I. FLEITAS  
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Attorney for Plaintiffs

### CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2024 I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Jason E. Dare, Esq.  
Biggs, Ingram & Solop  
Post Office Box 14028  
Jackson, Mississippi 39236  
[jdare@bislawyers.com](mailto:jdare@bislawyers.com)

This the 2nd day of February, 2024.

/s/ Victor Israel Fleitas

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VICTOR I. FLEITAS